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2 Acting Under Authority Conferred by 28 U.S.C. § 515

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10 Attorneys for United States of America

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,) CASE NOS. 23-CR-00471 WHO
15 Plaintiff,) 25-CR-00053 WHO
16 v.)
17 NOAH ROSKIN-FRAZEE,) STIPULATION RE PAYMENT OF CRIMINAL
18 Defendant.) MONETARY PENALTIES AND [PROPOSED]
19) ORDER

20 STIPULATION

21 The United States and defendant Noah Roskin-Frazee, by and through their respective counsel,
22 hereby stipulate and agree as follows:

23 1. The defendant has pleaded guilty to the counts in the Indictment in case number 23-CR-
24 00471 and the sole count of the Information in case number 25-CR-00053.
25 2. Although the Court has not yet imposed judgment, the defendant has agreed to pay a sum of
26 at least \$3,945,096.32 in restitution and to deposit at least \$1,000,000 with the Clerk of the
27 Court within 60 days of his guilty plea.

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STIPULATION AND [PROPOSED] ORDER

3. The defendant is liable for criminal monetary penalties, including special assessments under Title 18, United States Code, 3013, restitution imposed pursuant to Title 18, United States Code, Section 3663A, and fines imposed under Title 18, United States Code, Section 3571.
4. To facilitate the defendant's compliance with his contractual obligations with the United States—namely, his obligation to deposit \$1,000,000 in the registry of the Court within 60 days of his change of plea—as well as prompt distribution of restitution to victims, the Court should direct the Clerk to accept monies from the defendant.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court enter an order in the form proposed directing the Clerk to accept payment of any funds from the defendant and to hold such funds in the Clerk's Registry, including interest earned thereon, pending further order of the Court.

Respectfully submitted,

MARTHA BOERSCH
Attorney for the United States
Acting Under Authority Conferred
by 28 U.S.C. § 515

Dated: March 19, 2025

/s/
NIKHIL BHAGAT
Assistant United States Attorney

CONRAD METLITZKY KANE LLP

Dated: March 19, 2025

/s/
MIRANDA KANE
Counsel for Noah Roskin-Frazee

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and for good cause shown,

IT IS HEREBY ORDERED that the Clerk of Court shall allow payment of Defendant's anticipated obligations for criminal monetary penalties and/or forfeiture by check or by wire transfer, and shall provide wire transfer instructions to counsel for the parties at nikhil.bhagat@usdoj.gov and mkane@conmetkane.com.

IT IS FURTHER ORDERED that the Clerk of the Court shall accept any funds delivered to him via wire transfer and/or check that are designated under the case number 3:25-CR-00053-WHO and maintain such funds in the Clerk's Registry, including interest earned thereon, pending any further order of the Court.

IT IS SO ORDERED.

DATED:

HON. WILLIAM H. ORRICK
Senior United States District Judge